

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

MDL NO. 2804

Civ. No. 1:17-md-02804-DAP

THIS DOCUMENT RELATES TO:

JUDGE POLSTER

*Track One Cases*

**DISTRIBUTORS' AMENDED JOINT WITNESS LIST**

Pursuant to Federal Rule of Civil Procedure 26, the Defendants listed below hereby disclose the following witnesses who may testify at trial on their behalf.<sup>1</sup> This joint defense witness list is made on behalf of the following Defendants: AmerisourceBergen Drug Corporation and AmerisourceBergen Corporation; Cardinal Health, Inc.; Henry Schein, Inc. and Henry Schein Medical Systems, Inc.; McKesson Corporation; and Walgreen Co. and Walgreen

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<sup>1</sup> Distributors serve this joint list for purposes of efficiency and to avoid burdening the Court with overlapping or potentially duplicative witness lists. Inclusion of any particular witness, including expert witnesses, on this list does not indicate that every Distributor intends to individually offer that listed witness. Individuals marked with an asterisk are those for whom Defendants may designate video deposition testimony.

Eastern Co. (collectively, “Distributor Defendants”). This list is in addition to those witnesses identified on the named Defendants’ Individual Witness Lists and the Defendants’ Joint Witness List, and in addition to witnesses that may be played as part of the Distributor Defendants’ videotaped designations or counter-designations.

In serving this joint witness list, Distributor Defendants specifically reserve the right to amend, supplement, or otherwise modify these disclosures if new or modified information is provided at any point. Distributor Defendants also reserve the right to supplement and/or to amend their lists with any witnesses identified on any party’s witness lists, including any party who later settles or is severed or dismissed. Distributor Defendants further reserve the right to supplement and/or to amend this witness list in response to rulings of the Court on pretrial motions. Distributor Defendants reserve the right to call any of these witnesses as live witnesses in their case in chief.

**A. Expert Witnesses**

1. David A. Kessler, M.D., Senior Advisor, TPG Capital.

Areas of Testimony: Dr. Kessler is expected to testify about the opinions detailed in his expert report and on matters concerning his knowledge, skill, experience, education, and training.

2. Anna Lembke, M.D., Associate Professor; Chief of the Addiction Medicine Dual Diagnosis Clinic; Medical Director of Addiction Medicine; and Program Director of the Addiction Fellowship in the Department of

Psychiatry and Behavioral Sciences, Stanford University School of Medicine.

Areas of Testimony: Dr. Lembke is expected to testify about the opinions detailed in her expert report and on matters concerning her knowledge, skill, experience, education, and training.

3. Meredith B. Rosenthal, Ph.D., C. Boyden Gray Professor of Health Economics and Policy, Harvard T.H. Chan School of Public Health.

Areas of Testimony: Dr. Rosenthal is expected to testify about the opinions detailed in her expert report and on matters concerning her knowledge, skill, experience, education, and training.

## **B. Fact Witnesses**

1. Victor Borelli,\* Former National Account Manager, Mallinckrodt Pharmaceuticals.

Areas of Testimony: Mr. Borelli is expected to testify concerning his duties and responsibilities as a National Account Manager and his previous relevant employment.

2. David Haddox,\* Former Vice President of Health Policy, Purdue Pharmaceuticals.

Areas of Testimony: Mr. Haddox is expected to testify concerning his duties and responsibilities as a Vice President of Health Policy and related to his previous relevant employment.

3. Amanda Hogan,\* Former Associate Director of Marketing, Purdue Pharmaceuticals.

Areas of Testimony: Ms. Hogan is expected to testify concerning her duties and responsibilities as an Associate Director of Marketing and related to her previous relevant employment.

4. Gertrude Kass,\* Former Sales Representative, Purdue Pharmaceuticals.

Areas of Testimony: Ms. Kass is expected to testify concerning her duties and responsibilities as a Sales Representative and related to her previous relevant employment.

5. Richard Sackler, M.D,\* Former President and Co-Chairman of the Board, Purdue Pharmaceuticals.

Areas of Testimony: Dr. Sackler is expected to testify concerning his duties and responsibilities as the President and Co-Chairman of the Board for Purdue Pharmaceuticals and related to his previous relevant employment.

Dated: October 7, 2019

Respectfully Submitted,

/s/ Shannon E. McClure

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*Counsel for Walgreen Co. and Walgreen Eastern Co.*

**CERTIFICATE OF SERVICE**

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

*/s/ Geoffrey E. Hobart*  
Geoffrey E. Hobart